

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

KEITH COLE, JACKIE BRANNUM, RICHARD §
KING, MICHAEL DENTON, FRED WALLACE, §
and MARVIN RAY YATES, individually and on §
behalf of those similarly situated, §

Plaintiffs, §

v. §

BRYAN COLLIER, in his official capacity, §
ROBERTO HERRERA, in his official capacity, and §
TEXAS DEPARTMENT OF CRIMINAL JUSTICE, §

Defendants. §

CIVIL ACTION NO.
4:14-cv-1698

PLAINTIFFS' MOTION FOR CONTEMPT, TO SHOW CAUSE & SANCTIONS

Exhibit 1

Declaration of T. Henry

DECLARATION OF THELONIOUS HENRY

1. My name is THELONIOUS HENRY.
2. My date of birth is 3/13/1965.
3. My TDCJ number is 1612278.
4. I have been an inmate in the Texas Department of Criminal Justice (TDCJ)'s Wallace Pack Unit in Grimes County, Texas since _____.
5. I am assigned to the Stiles Unit at 12-D-A-2.
6. I am over 18 years of age, of sound mind, and capable of making this affidavit. The facts stated herein are within my knowledge and are true and correct.

T.H. THE AIR CONDITIONING HAS NOT BEEN WORKING IN MY HOUSING AREA AT THE STILES UNIT SINCE AT LEAST APPROXIMATELY THE MIDDLE OF JUNE 2019.

T.H. I AM NOT PERMITTED TO TAKE COLD SHOWERS AT THE STILES UNIT.

T.H. THE ICE OFTEN RUNS OUT IN MY HOUSING AREA.

T.H. I OFTEN FEEL HOT, SWEATY, DIZZY, AND DISORIENTED IN MY HOUSING AREA DUE TO THE HEAT.

Q I HAVE HIGH BLOOD PRESSURE AND TAKE MEDICATION

FOR IT

Q A TDCJ EMPLOYEE TOLD ME THAT A PART

FOR THE AIR CONDITIONING WAS BROKEN

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct.

Signature: Thelonious P. Henry Dated: 7/18/19

Printed Name: Thelonious P. Henry